

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**MDL No. 2804  
Case No. 17-md-2804  
Judge Dan Aaron Polster**

**This document relates to:**

*The County of Cuyahoga v. Purdue  
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.  
Purdue Pharma L.P. et al.*,  
Case No. 18-OP-45090

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**DECLARATION OF TIMOTHY W. KNAPP IN SUPPORT OF MANUFACTURER  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT  
ON PLAINTIFFS' PUBLIC NUISANCE CLAIMS**

I, Timothy W. Knapp, declare as follows:

1. I am an attorney at Kirkland & Ellis LLP, counsel for Defendants Allergan Finance, LLC, Allergan plc, Allergan Sales, LLC, and Allergan USA, Inc. in the above captioned case.
2. I submit this declaration in support of Manufacturer Defendants' Motion for Summary Judgment on Plaintiffs' Public Nuisance Claims.
3. Attached as Exhibit 1 is a true and correct copy of excerpts of the March 25, 2019 Expert Report of David Cutler.
4. Attached as Exhibit 2 is a true and correct copy of excerpts of the March 25, 2019 Expert Report of Meredith Rosenthal.
5. Attached as Exhibit 3 is a true and correct copy of excerpts of the March 25, 2019 Expert Report of Thomas McGuire Regarding Public Nuisance.

Respectfully submitted,

Dated: June 28, 2019

/s/ Timothy W. Knapp

Timothy W. Knapp  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Tel: (312) 862-2000  
timothy.knapp@kirkland.com

*Attorney for Defendants Allergan plc f/k/a Actavis plc;  
Allergan Finance, LLC f/k/a/ Actavis, Inc. f/k/a Watson  
Pharmaceuticals, Inc.; Allergan Sales, LLC; Allergan  
USA, Inc.*

CERTIFICATE OF SERVICE

I, Timothy W. Knapp, hereby certify that the foregoing document was served via electronic mail to all parties.

/s/ Timothy W. Knapp

Timothy W. Knapp  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Tel: (312) 862-2000  
timothy.knapp@kirkland.com